

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BRIAN RATCLIFF,)	CASE NO. 2:18-cv-00745
)	
Plaintiff,)	JUDGE ALGENON MARBLEY
)	
v.)	MAGISTRATE JUDGE KIMBERLY
)	JOLSON
MOUNT CARMEL HEALTH SYSTEM,)	
)	
Defendant.)	
)	

JOINT MOTION TO EXTEND REMAINING CASE DEADLINES

Pursuant to Local Rule 7.3(a), Plaintiff Brian Ratcliff (“Plaintiff”) and Defendant Mount Carmel Health System (“Defendant”) jointly move this Court to extend the current discovery deadline and the dispositive motions deadline approximately sixty (60) days beyond their current scheduled dates because the parties need additional time to conduct depositions. The reasons supporting this motion are set forth in more detail in the below memorandum.

Respectfully submitted:

/s/ Rayl L. Stepter (permission to file given)

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MEMORANDUM IN SUPPORT

Good cause exists to grant the parties' requested extension of approximately sixty (60) days. The parties have already exchanged written discovery, including interrogatories and requests for production. Further, the parties are diligently scheduling depositions. However, the parties require more time to complete these depositions.

There have been no prior extensions of the case schedule. Importantly, neither party will be prejudiced by the requested extension. Indeed, the requested extension will help the parties explore the facts in more detail and further develop their respective cases. Accordingly, the parties respectfully request that the Court enter an order extending the remaining deadlines in the original case schedule by approximately sixty (60) days. This will result in a new discovery cut-off date of May 31, 2019 and a dispositive motion deadline of June 28, 2019. The parties will submit a proposed order pursuant to Local Rule 7.3(a).

Respectfully submitted:

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CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2019, a copy of the foregoing was electronically filed. Notice of this filing will be sent to all parties, who are registered with the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Samuel E. Endicott

An Attorney for Defendant
Mount Carmel Health System